

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JUN 12 P 5:32

DEBORAH CHIN, On Behalf of Herself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10294-DPW
Plaintiff,	:	HONORABLE JUDGE COURT Hon. Douglas P. Woodlock, U.S. MASS
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10308-DPW
Plaintiff,	:	Hon. Douglas P. Woodlock
v.	:	
SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL,	:	
Defendants.	:	

**MOTION OF PLAINTIFF SAVERIO
PUGLIESE FOR CONSOLIDATION AND FOR APPOINTMENT OF
LEAD PLAINTIFF, LEAD COUNSEL AND LIAISON COUNSEL**

MICHELLE TREBITSCH, On Behalf of Herself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10307-DPW
Plaintiff,	:	Hon. Douglas P. Woodlock
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated,	:	Civil Action No. 04-CV-10309-DPW
Plaintiff,	:	Hon. Douglas P. Woodlock
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
SAMANTHA DEN, Individually and on Behalf of All Others Similarly Situated,	:	Civil Action No. 04-CV-10310-DPW
Plaintiff,	:	Hon. Douglas P. Woodlock
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	

RICHARD CURTIS, on Behalf of Himself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10314-MLW
Plaintiff,	:	Hon. Mark L. Wolf
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
RONALD KASSOVER, on Behalf of Himself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10329-DPW
Plaintiff,	:	Hon. Douglas P. Woodlock
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
STEVE L. BAKER, Individually and on Behalf of All Others Similarly Situated,	:	Civil Action No. 04-CV-10333-DPW
Plaintiff,	:	Hon. Douglas P. Woodlock
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	

MICHAEL KAFFEE, on Behalf of Himself and All Others Similarly Situated, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10345-DPW Hon. Douglas P. Woodlock
HAIMING HU, Individually and on Behalf of All Others Similarly Situated, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10346-DPW Hon. Douglas P. Woodlock
CHARLES STARBUCK, Individually and on Behalf of All Others Similarly Situated, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10362-DPW Hon. Douglas P. Woodlock

SAMUEL HO, Individually and on Behalf of All Others Similarly Situated, Plaintiff v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10363-DPW Hon. Douglas P. Woodlock
JEFFREY C. RODRIGUES, Individually and on Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10364-DPW Hon. Douglas P. Woodlock
ROBERT CONTE and MARK RESPLER, On Behalf of Themselves and all Others Similarly Situated, Plaintiff v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants.	:	Civil Action No. 04-CV-10382-DPW Hon. Douglas P. Woodlock

WHEATON ELECTRICAL SERVICES RETIREMENT 401K PROFIT SHARING, On Behalf of Itself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10383-DPW Hon. Douglas P. Woodlock
Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
BRIAN CLARK, On Behalf of Himself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10454-DPW Hon. Douglas P. Woodlock
Plaintiff, v. SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL,	:	
Defendants.	:	
SHEILA BROWNWELL, On Behalf of Herself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10597-DPW Hon. Douglas P. Woodlock
Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
SAVERIO PUGLIESE, On Behalf of Himself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10612-DPW Hon. Douglas P. Woodlock
Plaintiff, v.	:	

SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
DAVID V. NOCITO, On Behalf of Himself and All Others Similarly Situated,	:	Civil Action No. 04-CV-10623-DPW
Plaintiff,	:	Hon. Douglas P. Woodlock
v.	:	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	

PLEASE TAKE NOTICE that pursuant to Rule 42(a) of the Federal Rules of Civil Procedure and Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 ("PSLRA"), Plaintiff Saverio Pugliese ("Pugliese") will move this Court, at a time and place to be determined later, for an Order:

- (1) consolidating the above-captioned related actions filed on behalf of the purchasers of Sonus Networks, Inc. common stock;
- (2) appointing Pugliese as Lead Plaintiff in the above related actions under Section 21(D)(a)(3)(B) of the PSLRA; and
- (3) approving Pugliese's selection of Zwerling, Schachter & Zwerling, LLP as Lead Counsel and Berman DeValerio Pease Tabacco Burt & Pucillo as Liaison Counsel.

This motion is supported by the accompanying Memorandum of Law in Support of Motion of Plaintiff Saverio Pugliese for Consolidation and for Appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel, the Affidavit of Richard Speirs in Support of Motion of Plaintiff Saverio Pugliese for Consolidation and for Appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel together with the exhibits attached thereto, the [Proposed] Order Consolidating the Actions, Appointing Plaintiff and Saverio Pugliese Lead Plaintiff and Approving Lead Plaintiff's Choice of Lead Counsel and Liaison Counsel, all of the prior pleadings and proceedings had herein, and such other written and/or oral argument, as may be presented to the Court.

Dated: Boston, MA
April 12, 2004

Respectfully submitted,

**BERMAN DEVALERIO PEASE
TABACCO BURT & PUCILLO**

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